

Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

)	
<i>In re</i>)	
)	
Distribution of Cable Royalty Funds)	Docket No. 16-CRB-0009-CD (2014-17)
)	
)	
)	

**JOINT SPORTS CLAIMANTS' SUBMISSION OF DOCUMENTS
FOR *IN CAMERA* REVIEW**

Pursuant to Order 31 Further to Order 30 on Public Television's Motion to Enforce Order 27, the Joint Sports Claimants ("JSC") hereby submit the documents identified by Public Television for *in camera* review.

To provide the Copyright Royalty Judges with additional context and the full basis for JSC's privilege claims, JSC has included with this submission: (i) full document families, i.e., cover emails to documents identified by PTV that were attachments to emails, and vice versa; and (ii) the Declaration of James Trautman, attached at Exhibit A, regarding certain documents identified by PTV that were collected from Bortz Media & Sports Group, Inc.'s physical server or Dropbox file hosting service.

For emails, Microsoft Word documents, and PDFs in this submission, JSC has included the bates stamped slip sheet produced to other parties noting that the document was withheld for privilege as the first page of the file, and the underlying document as the remaining pages. Excel files have been produced in native format without the original production slipsheet. The file name for each document contains both the log line number and bates number for that document.

Dated: April 14, 2023

JOINT SPORTS CLAIMANTS

/s/ Ryan White

Daniel A. Cantor (DC Bar No. 457115)
Michael Kientzle (DC Bar No. 1008361)
Rosemary Szanyi (D.C. Bar No. 997859)
Ryan White (D.C. Bar No. 1655918)
ARNOLD & PORTER KAYE SCHOLER LLP
601 Massachusetts Avenue, N.W.
Washington, DC 20001
Telephone: (202) 942-5000
Facsimile: (202) 942-5999
Daniel.Cantor@arnoldporter.com
Michael.Kientzle@arnoldporter.com
Rosemary.Szanyi@arnoldporter.com
Ryan.White@arnoldporter.com

Douglas F. Curtis (Ill. Bar No. 6329143)
ARNOLD & PORTER KAYE SCHOLER LLP
70 West Madison Street
Chicago, IL 60602-4231
312.583.2300 (voice)
Doug.Curtis@arnoldporter.com

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of April, 2023, I caused a copy of the foregoing to be served on all parties registered to receive notice by eCRB by filing through the eCRB filing system.

/s/ Ryan White

Ryan White

EXHIBIT A

**Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.**

<i>In re</i>)	
)	
)	
Distribution of Cable Royalty Funds)	Docket No. 16-CRB-0009-CD (2014-17)
)	
)	

DECLARATION OF JAMES TRAUTMAN

I, James Trautman, hereby declare under penalty of perjury as follows:

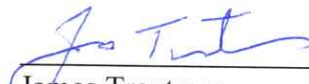
1. I have reviewed certain documents that I understand are being provided to the Copyright Royalty Judges for *in camera* review, including JSC 00080948, JSC 00081070, JSC 00081158, and JSC 00090960-JSC 00090961.

2. Regarding JSC 00080948, which I understand is located at Line 1 of JSC's March 10, 2023 privilege log: I prepared this document at the request of and for discussion with JSC counsel Stephen Marsh in anticipation of potential litigation covering the 2010 royalty year. I sent a version of this document to Mr. Marsh via e-mail, as shown in JSC 00090960-JSC 00090961, which I understand can be found at Lines 766-767 of JSC's March 20 privilege log.

3. Regarding JSC 00081070, which I understand is located at Line 16 of JSC's March 10, 2023 privilege log: I prepared this document at the request of JSC counsel Sean Laane in anticipation of the 2010-13 cable royalty allocation proceeding.

4. Regarding JSC 00081158, which I understand is located at Line 101 of JSC's March 10, 2023 privilege log: I prepared this document at the direction of JSC counsel, including Michael Kientzle, as an outline and initial draft of the issues to be addressed in my written testimony for the 2014-2017 cable royalty allocation proceeding.

Executed this 14th day of April, 2023.



James Trautman

Proof of Delivery

I hereby certify that on Friday, April 14, 2023, I provided a true and correct copy of the JSC Submission of Documents for In Camera Review to the following:

Broadcast Music, Inc. (BMI), represented by Jennifer T. Criss, served via E-Service at jennifer.criss@dbr.com

National Public Radio, represented by Gregory A Lewis, served via E-Service at glewis@npr.org

Commercial Television Claimants / National Association of Broadcasters, represented by David J Ervin, served via E-Service at dervin@crowell.com

Canadian Claimants, represented by Lawrence K Satterfield, served via E-Service at lksatterfield@satterfield-pllc.com

Multigroup Claimants, represented by Brian D Boydston, served via E-Service at brianb@ix.netcom.com

Global Music Rights, LLC, represented by Scott A Zebrak, served via E-Service at scott@oandzlaw.com

Program Suppliers, represented by Lucy H Plovnick, served via E-Service at lh@msk.com

Major League Soccer, L.L.C., represented by Edward S. Hammerman, served via E-Service at ted@copyrightroyalties.com

SESAC Performing Rights, LLC, represented by Timothy L Warnock, served via E-Service at twarnock@loeb.com

Public Television Claimants, represented by Ronald G. Dove Jr., served via E-Service at rdove@cov.com

ASCAP, represented by Sam Mosenkis, served via E-Service at smosenkis@ascap.com

Devotional Claimants, represented by Matthew J MacLean, served via E-Service at matthew.maclean@pillsburylaw.com

Signed: /s/ Ryan D White